

***Changes Recommended by SWICS to the DRAFT ETAAC Letter to  
CARB on the Draft Scoping Plan – September 4, 2008***

***Paragraph at bottom of page 2 of Draft ETTAC Letter***

While a properly structured carbon market can reduce emissions and costs ETAAC notes that it alone is not enough to break down all the barriers to transforming California's energy market to a low-carbon future (p. 1-4). To that end, the Draft Plan outlines direct measures touching on most sectors of the economy, including important focus areas such as energy efficiency, sustainable forests, and water in addition to the more obvious and frequently mentioned electricity/natural gas, transportation, and industrial sectors. However, CARB has not proposed to include any measures in the plan to increase recycling or composting, noting that they are discussing these ideas with the California Integrated Waste Management Board. We believe that ~~including a~~ CARB should continue to work with the CIWMB to develop a strong recycling/composting/ ~~renewable energy-from-waste component in the final plan~~ program is important to avoid landfill emissions ~~minimize GHG emissions~~, and also avoid the upstream emissions from extracting and processing raw materials into products and fertilizer (see ETAAC Chapter 4.IV for relevant recommendations). (\*2)